

**STATEMENT OF BASIS (AI No. 25229)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0110264 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Greene's Energy Group  
Devin Rental Tools, Inc.  
Post Office Box 80859  
Lafayette, Louisiana 70598

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** January 26, 2010

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permits – LA0110264**  
LPDES permit effective date: February 1, 2005  
LPDES permit expiration date: January 31, 2010

**C. Date Application Received:** September 28, 2009

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield service company**

Devin Rental Tools, Inc. is an existing oilfield service company. The facility services the oil and gas industry specializing in oilfield rental tools and maintenance. Operations include washing and maintenance of oilfield service equipment.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II\*
3. Wastewater Type: II
4. SIC code: 1389

\*\* This facility has an SIC Code of 1389 with an assigned complexity type of II and a corresponding 10 point rating. However, because of the low volume of equipment washwater discharge, the points have been BPJ'ed from 10 points to 5 points.

**C. LOCATION - 2545 Southeast Evangeline Thruway, Lafayette, Lafayette Parish**  
Latitude 30° 11' 21", Longitude 91° 59' 32"

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### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: equipment washwater and stormwater runoff  
Treatment: oil/water separator and settling with chemical additives  
Location: at the point of discharge from the treatment system located on the northeast side of the facility  
Flow: 500 gpd  
Discharge Route: local drainage thence to Bayou Tortue

### 4. RECEIVING WATERS

STREAM - local drainage thence to Bayou Tortue

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060801

DESIGNATED USES -  
a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. agriculture

### 5. TMDL STATUS

Subsegment 060801 is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/ low DO, pathogen indicators, suspended solids/ turbidity/ siltation, and carbofuran, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060801:

#### Carbofuran

The TMDL for *Carbofuran in the Mermentau and Vermilion Teche River Basins* was final on March 21, 2002. No allocation was given to point source discharges in the Vermilion - Teche River Basin. According to the TMDL, there is only one point source in the Vermilion - Teche (FMC Corp. LA0064360) but it does not discharge Carbofuran. In addition, this facility has no potential to discharge Carbofuran. Therefore, requirements for Carbofuran will not be placed in this permit.

#### Suspended solids/turbidity/siltation

As per the *TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin*, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Therefore, standard TSS limitations are included in this permit.

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#### Pathogen Indicators

Per *The Vermilion River Fecal Coliform TMDL*, there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL. This facility's discharges were not addressed in the TMDL. This facility is not expected to discharge pollutants which would contribute to the pathogen indicators impairment.

#### Organic Enrichment/Low DO

Per the EPA's *Vermilion River Dissolved Oxygen and Nitrogen TMDL*, the limits apply to sanitary discharges, and process outfalls of food processors and seafood processors. For discharges less than 25,000 GPD, secondary limits shall apply as per the TMDL. This facility's discharges were not addressed in the TMDL. The organic enrichment/low DO impairment shall be addressed through the COD parameter.

#### Nitrogen

The *TMDL for Dissolved Oxygen and Nutrients in the Vermilion River* was final on April 5, 2001. No allocation was given to point source discharges in the Vermilion - Teche River Basin. See *In The Matter of Sierra Club and Louisiana Environmental Network Request for Nutrient Limits*. Docket No. AHD-DR-96001. LDEQ April 29, 1996. LAC 33:IX.2707.D.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through a COD limitation. Compliance with the COD limitation as the indicator parameter will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the effluent limitations in the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in the permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

#### Phosphorus

As per the February 29, 2000 Delist (Federal Register Notice: Vol. 65, Num. 173, pages 54032-54034, 9/6/2000), assessment of new data and information shows this segment is meeting water quality standards for Phosphorus. Therefore, requirements for total phosphorus were not included in this permit.

### **6. CHANGES FROM PREVIOUS PERMIT**

There were no changes since the last permit.

### **7. COMPLIANCE HISTORY/COMMENTS**

There was an inspection at the facility on May 21, 2009. The findings were as follows: (1) facility is an oilfield service company with no spill areas noted and a 500 gallon diesel tank with containment around it; (2) facility has been hauling off the washwater from the wash rack area; (3) no SWP3 available at the time of inspection; (4) DMR's indicated no discharge.

DMR's were reviewed for the last two years (3/07 – 3/09). All DMR's were submitted in accordance with the existing permit. There was one excursion noted in May 2007 for COD (661 mg/L).

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## 8. EXISTING EFFLUENT LIMITS

Outfall 001 – equipment washwater and stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/month Est.	Report 1/month Est.
TSS	---	45 mg/L 1/month Grab
COD	---	125 mg/L 1/month Grab
Oil & Grease	---	15 mg/L 1/month Grab
pH	6.0-9.0 s.u. 1/month Grab	
Soaps & Detergents	Report 1/month Inventory Calculation	---
Visible Sheen	---	No Presence 1/day Observation

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060801 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 10, 2010, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the

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Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Greene's Energy Group

1. **Outfall 001 - equipment washwater and stormwater runoff (estimated flow is 500 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	125	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

**Treatment:** oil/water separator and settling with chemical additives

**Monitoring Frequency:** daily for Oil and Grease, Visual and monthly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the treatment system located on the northeast side of the facility prior to mixing with other waters. Soaps and Detergents: document in a monthly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

\* Existing permits for similar outfalls  
BPJ Best Professional Judgement  
su Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance,** the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).